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February 11, 2025

FILED VIA ECF

Hon. Jesse M. Furman, U.S.D.J.
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007

**Re: Local 175 Pension Fund, et al. v. The Safety Group, Ltd., a.k.a. Safety Professional Association, Inc.
Civil Action No. 24-CV-06955 (JMF)**

Dear Judge Furman:

This firm represents the Plaintiffs in the above-referenced complaint to compel an audit, and to collect unpaid benefit fund contributions, plus interest, damages, fees, and costs from Defendant The Safety Group, Ltd., a.k.a. Safety Professional Association, Inc. (“Defendant” or “Employer”). We write regarding the Court’s entry of partial summary judgment earlier today and the timeframe set forth by the Court for additional submissions.

We understand that the Court ordered the interest to be calculated and provided to the Court by February 18, 2025. However, the Plaintiffs informed me that the representative for Safety Professionals of America, Local 33 (the “Union”) who received the checks for the outstanding contributions from the Employer is away from the office until Friday, February 21, 2025. The Funds require information from the Union representative in order to process and allocate the contributions correctly, and thereafter to accurately assess the amount of interest owed from the date each month’s contributions were due through until February 7, 2025, when the payment checks were received by the Union.

Because of these circumstances, we respectfully request that the deadline for Plaintiffs to submit the final interest amount in accordance with paragraph two (2) of the Default Judgment be changed from February 18, 2025 to February 28, 2025, which is one week after the Union representative’s return.

Application GRANTED. The Clerk of
Court is directed to terminate ECF No. 37.

Respectfully submitted,
Elise S. Feldman
Elise S. Feldman

SO ORDERED.

cc: Robert Simoni, Employer Representative (via e-mail: rsimoni@safetygroupltd.com) February 12, 2025